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REMARKS

Applicants appreciate the indication that Claims 27-33 stand allowed.

Claims 1-34 were pending in the present application. Claim 29 has been canceled, and Claims 1, 6, 23, 24 have been amended, leaving Claims 1-28 and 30-34 for consideration upon entry of the present Amendment. The proposed amendments clearly define over the cited references and entry is requested for at least that reason. Alternatively, the amendment should be entered because it places the claims in better form for appeal.

Support for the amendment to Claims 1, 23 and 24 can be found in Applicants' original specification at page 9, lines 3-10. Support for the amendment to Claim 6 can be found in Applicants' original specification at page 9, lines 15. No new matter has been introduced by these amendments.

Reconsideration and allowance of the claims is respectfully requested in view of the above amendments and the following remarks.

Claim Rejections Under 35 U.S.C. § 112, Second Paragraph

Claims 23-26, and 29 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicants respectfully traverse.

The rejection applied to Claims 23-26 has been rendered moot in view of the amendment thereto. Claim 29 has been cancelled. In view of the foregoing, Applicants request that the rejection be withdrawn.

Claim Rejections Under 35 U.S.C. § 102(b)

A. Claims 1-3, 5-7, 9-11, 13, 15-18, 20-21, 23, and 24 stand rejected under 35 U.S.C. § 102(b) as allegedly anticipated by Kanai et al. (56-166386). Applicants respectfully traverse.

Kanai is generally directed to a method for removing lead oxide from a surface of a metallic substrate, e.g., a titanium electrode. The method includes dipping the metal substrate into mixed

solutions of acetic acid, hydrogen peroxide, and hydrosilicofluoric acid or its acid salt.

To anticipate a claim, a reference must disclose each and every element of the claim. *Lewmar Marine v. Varient Inc.*, 3 U.S.P.Q.2d 1766 (Fed. Cir. 1987).

Kanai fails to anticipate Applicants' independent Claims 1 and 23 because Kanai fails to disclose dipping the metallic substrate into an aqueous composition consisting essentially of an acid having the formula H_xAF_6, or precursors to the acid, wherein A is selected from the group consisting of Si, Ge, Ti, and Ga; and x is 1-6. Kanai discloses removing lead dioxide with a *mixture* of solutions including acetic acid, hydrogen peroxide and hydrosilicofluoric acid. There is no disclosure of dipping a metallic substrate into an aqueous composition consisting essentially of an acid having the formula H_xAF_6, or precursors to the acid as claimed by Applicants.

With regard to Claim 24, Kanai fails to disclose removing diffusion or overlay coatings, wherein the diffusion coating comprises an aluminide alloy, and wherein the overlay coating comprises a composition having a formula of MCrAl(X), wherein M is an element selected from the group consisting of Ni, Co, Fe, and combinations thereof, and wherein X is an element selected from the group consisting of Y, Ta, Si, Hf, Ti, Zr, B, C, and combinations thereof.

As all elements of independent Claims 1, 23, and 24 have not been taught, these claims are patentable over the cited reference. Given that Claims 2-3, 5-7, 9-11, 13, 15-18, and 20-21 each further limit and ultimately depend from one of these independent claims, they too are patentable.

B. Claims 1-4, 6-8, 17-19, 22-23, and 34 stand rejected under 35 U.S.C. § 102(b) as allegedly anticipated by US Patent No. 5,817,182 to O'Brien. Applicants respectfully traverse.

O'Brien is generally directed to an etching process for removing the manufacture of semiconductor devices. The etching process includes exposing a thermal oxide surface with buffered and unbuffered HF solutions.

O'Brien fails to disclose removing an oxidation product from a substrate by contacting the substrate with an aqueous composition *consisting essentially* of an acid having the formula H_xAF_6, or precursors to said acid, wherein A is selected from the group consisting of Si, Ge, Ti, and Ga; and x is 1-6. In O'Brien, the solution applied to the thermal oxide surface is a buffered or an unbuffered HF solution. As noted by the Examiner, an H_2SiF_6 byproduct of the initial reaction between HF and SiO_2 is formed. However, this is in addition to HF. Thus, the solution applied to the substrate does not *consist essentially* of an acid having the formula H_xAF_6 as claimed by Applicants.

Accordingly, the rejection applied to Claims 1-4, 6-8, 17-19, 22-23, and 34 is requested to be withdrawn.

C. Claims 1-2, 6, 9, 12-14, 17, 23, and 34 stand rejected under 35 U.S.C. § 102(b) as allegedly anticipated by US Patent No. 5,227,016 to Carlson. Applicants respectfully traverse.

Carlson is generally directed to a process for desmutting aluminum and aluminum alloy surfaces by contacting the surfaces with a desmutting composition. The desmutting comprising includes an oxidizing inorganic acid, phosphoric and sulfuric acids, simple and complex fluoride ions, and organic carboxylic acid having from 1 to 10 carbon atoms, and manganese.

Carlson fails to disclose removing an oxidation product from a substrate by contacting the substrate with an aqueous composition *consisting essentially* of an acid having the formula H_xAF_6, or precursors to said acid, wherein A is selected from the group consisting of Si, Ge, Ti, and Ga; and x is 1-6. Withdrawal of the rejection is hereby requested for at least this reason.

Claim Rejections Under 35 U.S.C. § 103(a)

Claims 1-7, 9-13, 15-23, and 34 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over in view of US Patent No. 3,062,748 to Harrison . Applicants respectfully traverse this rejection.

Harrison is generally directed to decreasing the corrosivity of HCl acid solutions upon contact with metal surfaces. HCl solutions are admixed with a fluorine compound and an abietyl amine compound.

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For an obviousness rejection to be proper, the Examiner must meet the burden of establishing a *prima facie* case of obviousness, i.e., that all elements of the invention are disclosed in the prior art; and that the prior art relied upon, coupled with knowledge generally available in the art at the time of the invention, contain some suggestion or incentive that would have motivated the skilled artisan to modify a reference or combined references. *In re Fine*, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988); *In Re Wilson*, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970); *Amgen v. Chugai Pharmaceuticals Co.*, 927 U.S.P.Q.2d, 1016, 1023 (Fed. Cir. 1996).

Harrison fails to establish a prima facie case of obviousness because Harrison fails to teach or suggest removing an oxidation product from a substrate by contacting the substrate with an aqueous composition *consisting essentially* of an acid having the formula H_xAF_6, or precursors to said acid, wherein A is selected from the group consisting of Si, Ge, Ti, and Ga; and x is 1-6. Harrison is specifically directed to lessening the corrosivity of HCl solutions. There is no motivation to modify Harrison such that the aqueous composition *consists essentially* of an acid having the formula H_xAF_6, or precursors to said acid, wherein A is selected from the group consisting of Si, Ge, Ti, and Ga; and x is 1-6.

In view of the foregoing, the rejection of Claims 1-7, 9-13, 15-23, and 34 is requested to be withdrawn.

It is believed that the foregoing amendments and remarks fully comply with the Office Action and that the claims herein should now be allowable to Applicants. Accordingly, reconsideration and allowance is requested.

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If there are any additional charges with respect to this Amendment or otherwise, please charge them to Deposit Account No. 06-1130 maintained by Applicant's attorneys.

Respectfully submitted,

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